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November 21, 1994

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

EX PARTE

William F. Caton
Acting Secretary
Federal Communications Commission
Mail Stop 1170
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Dear Mr. Caton:

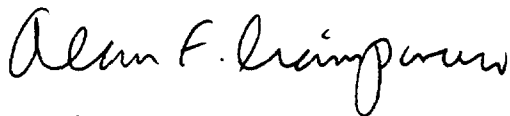
Re: CC Docket No. 92-237, *Administration of the North American Numbering Plan*
CC Docket No. 94-54, *Equal Access and Interconnection Obligations Pertaining to*
Commercial Mobile Radio Services

On behalf of Pacific Bell, please find attached a written ex parte presentation regarding the above-referenced proceedings. Please associate this material with these proceedings.

We are submitting two copies of this notice in accordance with Section 1.1206(a)(1) of the Commission's Rules.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,



Attachment

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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**

The Honorable Reed E. Hundt
Chairman
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D.C. 20554

Dear Chairman Hundt:

This letter is in response to a letter you received on October 27, 1994 from the Cellular Telecommunications Industry Association ("CTIA") regarding hurdles to be cleared with respect to the implementation of a federal wireless policy.

CTIA alleges that some of these hurdles have been raised by actions of the local exchange companies ("LECs"). CTIA specifically refers to number assignment and mutual compensation. However, CTIA's cursory discussion of these issues is misleading and fails to address the complexity of these two difficult issues.

The federal policy on mutual compensation relates to the costs of interstate switching (switching of interstate calls to interexchange carriers) and it allows the landline or the cellular carrier to recover "its actual cost of switching traffic for the other carrier." However, the costs of interstate switching are already addressed by federal access charges.

Interstate calls originated by a mobile customer are handled one of two ways. Either the call goes directly to an interexchange carrier ("IEC") or it comes to a local exchange carrier and is switched to an IEC. In the first case, there is no compensation to the LEC because the LEC has incurred no costs. In the second case, the IEC compensates the LEC for interstate switching costs via the access charge. The mobile carrier is not charged by the LEC for interconnection. Likewise, if we receive an interstate call and we hand it off to a mobile carrier, there is no interconnection charge assessed on the mobile carrier. The IEC compensates us through interstate access charges. Since mobile carriers are not compensating us nor being charged by use with respect to interstate calls, "mutual" compensation is inapplicable. This is currently an issue in CC Docket No. 94-54.

CTIA also raises an issue with respect to number assignment. It supports placing the number assignment responsibility with a non-government, non-telephone company

The Honorable Reed E. Hundt
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body. We have no objection to this. We have stated our willingness to transfer central office code assignment to a third party based upon a plan developed by California stakeholders. If the national administrator chosen to replace Bellcore (as NANPA) could prove its capability to administer CO codes for California and it was supported by California stakeholders, Pacific Bell could support the transfer of CO code administration to the national administrator of the North American Numbering Plan at some time in the future.

With respect to current number assignment, CTIA states that in Los Angeles, we are proposing to assign 10 digit numbers to wireless subscribers which it claims will result in cost and confusion that will harm wireless subscribers and benefit us. This bald assertion suggests that wireless subscribers are being singled out for unfavorable treatment. This is not the case. We are treating all tandem interconnectors the same. Moreover, a dialing imbalance of seven digits vs. eleven is not a competitive issue.

Customers in Los Angeles frequently dial 1 plus 10 digits for calls since there are six area codes (213, 310, 714, 805, 909, and 818) in the greater Los Angeles area, three of which serve the city of Los Angeles (213, 310 and 818). Local calls are charged local rates regardless of the number of digits dialed. Mileage, not the number of digits, determines the price of a call. Furthermore, any introduction of a new area code which is the source of CTIA's concern in Los Angeles requires that some customers will now have to dial 1 plus the new area code and the seven digit number.

Number assignments arising out of a new area code involve the balancing of many interests. In Los Angeles the situation to which CTIA refers originated in 1991 when area code 310 was created because of the impending exhaust of 213. To accomplish the area code split which created 310, 2.4 landline customers had to change their telephone numbers. During this area code split, most wireless customers were not affected. Now 310 is itself exhausting because of the enormous demand for wireless codes. In 1994, 80% of the demand for numbering resources was for wireless growth.

In order to plan for a new area code, we looked at various options, including another area code split and an overlay. If 310 were to be split, wireless providers would need to change approximately 60 NXX codes and many customers that changed their number in 1991 would again have to change their numbers. We have proposed an overlay instead. In the initial phase, currently proposed for September 1995, carriers that interconnect at the tandem switches that have new growth would be assigned the new code first. This is because the technology to recognize an overlay area code is currently only present in these tandem switches. In addition the LEC maintenance, billing and provisioning systems will require significant changes and upgrades.

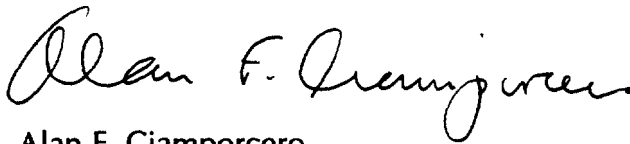
The Honorable Reed E. Hundt
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Eventually the new area code will be available in all end office switches and support systems.

Those cellular carriers that interconnect at tandem switches receive the new numbers first. However, any tandem interconnector is in the same position. Cellular carriers can interconnect at the end office rather than the tandem if they choose. In area code 310, 50% of the wireless industry numbers reside in end-offices and 50% reside in tandem offices. Our current proposal includes having the end-office interconnectors begin to use the overlay area code by end of 1996. In sum, the introduction of the new area code in Los Angeles will not advantage cellular carriers. We have addressed this numbering issue previously in CC Docket No. 92-237

In conclusion, we share the CTIA's desire to see competitive wireless service expand and we fully intend to assist in that effort, not hinder it. This letter is being served on all parties in CC Dockets 92-237 and 94-54.

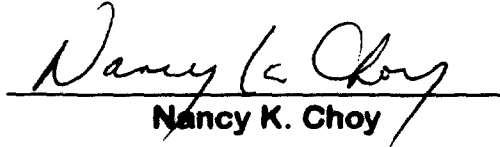
Sincerely,

A handwritten signature in cursive script, reading "Alan F. Ciamporzero".

Alan F. Ciamporzero
Executive Director
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CERTIFICATE OF SERVICE

I, Nancy K. Choy, do hereby certify that a copy of the foregoing Letter was served this 21st day of November, 1994, via first class United States mail, postage prepaid to the parties on the following list.


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